

Karen A. Confoy
Paul W. Kalish
FOX ROTHSCHILD LLP
Princeton Pike Corporate Center
997 Lenox Drive
Lawrenceville, NJ 08648
Phone: (609) 844-3033
kconfoy@foxrothschild.com
pkalish@foxrothschild.com

OF COUNSEL:

Matthew J. Oppenheim (*pro hac vice*)
Scott A. Zebrak (*pro hac vice*)
Jeffrey M. Gould (*pro hac vice*)
Nicholas C. Hailey (*pro hac vice*)
Daryl L. Kleiman (*pro hac vice*)
OPPENHEIM + ZEBRAK, LLP
4530 Wisconsin Avenue, NW, 5th Floor
Washington, DC 20016
Phone: (202) 480-2999
matt@oandzlaw.com
scott@oandzlaw.com
jeff@oandzlaw.com
nick@oandzlaw.com
dkleiman@oandzlaw.com

Attorneys for Plaintiff Pearson Education, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PEARSON EDUCATION, INC.,

Plaintiff,

v.

CHEGG, INC.,

Defendant.

Civil Action No. 21-cv-16866-EP-ESK

**AMENDED COMPLAINT FOR
COPYRIGHT INFRINGEMENT
(17 U.S.C. § 101, *et seq.*)**

DEMAND FOR JURY TRIAL

Plaintiff Pearson Education, Inc. (“Pearson”), for its Amended Complaint against Defendant Chegg, Inc. (“Chegg”), alleges, on personal knowledge as to matters relating to Pearson and on information and belief as to all other matters, as set forth below.

NATURE OF THE CASE

1. Pearson is the world’s leading learning company. Through an enormous investment of money, time, and effort, Pearson creates and publishes many of the world’s greatest educational textbooks. Pearson’s textbook titles span virtually all academic subject areas and are widely used at universities, colleges, and schools around the world to maximize the learning experience for millions of students annually. Pearson brings this case to address systematic and widespread copyright infringement that simultaneously undermines learning.

2. As part of Pearson’s focus on pedagogy, Pearson and its authors devote significant creative effort to develop effective, imaginative, and engaging questions to include in the textbooks it publishes. Pearson’s end-of-chapter questions are strategically designed and carefully calibrated to reinforce key concepts taught in the textbooks, test students’ comprehension of these issues, enhance students’ problem-solving skills, and, ultimately, improve students’ understanding of the subject matter. Pearson’s textbooks can contain hundreds or thousands of end-of-chapter questions. These end-of-chapter questions form core components of the teaching materials contained in Pearson textbooks and are frequently hallmarks of Pearson titles. As such, the availability, quality, and utility of these questions are often important considerations when educators select which textbooks to adopt for their courses.

3. Pearson owns and/or controls the exclusive rights to the copyrights of its textbooks, including the hundreds or thousands of original end-of-chapter questions typically contained within each textbook, and Pearson has the exclusive right to control the preparation

and distribution of answer sets to the questions in Pearson’s textbooks. The sale of a work that is based on, and copies from, the creative efforts of Pearson and its authors violates Pearson’s exclusive rights under the Copyright Act.

4. Chegg is a company that sells textbook answers. The majority of Chegg’s \$644 million in total revenue in 2020 came from its sales of answers through a service called “Chegg Study,” which costs \$14.95 a month, with subscribers surging by 67% to 6.6 million in 2020. Chegg hires thousands of freelancers to prepare answers to textbook questions. Chegg then systematically publishes these answer sets on the Chegg Study website, where they are organized by the titles of the corresponding textbooks—using precisely the same unit, chapter, and topic orders and naming conventions for the questions employed in the textbooks—so that students can easily search for and find answers to the textbook questions they have been assigned. Today, Chegg boasts of having “millions of homework answers” to end-of-chapter questions from 9,000 textbooks, a significant number of which are published by Pearson.

5. By using and copying Pearson’s original creative content to make answer sets based on that content, Chegg infringes Pearson’s exclusive rights as a copyright holder, including the rights of reproduction, preparation of derivative works, distribution, and public display. If, when, and how Pearson provides answer sets to its textbook questions is a right owned by Pearson that Chegg usurped for itself.

6. Textbook questions are intended to be part of the learning progression. Educators assign selected textbook questions as homework and as study aids to help in the education process. Chegg’s infringement through the sale of answer sets, covering most if not all of the questions in textbooks, diminishes educators’ ability to use the textbooks and end-of-chapter

questions and can even lead educators to reconsider using Pearson's textbooks as components of their courses.

7. Pearson and Chegg have done business with each other in several ways over the years. But no aspect of the parties' business dealings with one another—or the law—permits Chegg's conduct complained of herein. In particular, in 2016, Pearson granted Chegg a limited license to reproduce questions from certain Pearson textbooks, but not all of the textbooks listed on Exhibit A that are at issue in this case. That license also did not apply to answers and, in any event, that license ceased as of June 1, 2021.

8. Pearson has told Chegg both verbally and in writing to remove the answers to Pearson's questions from Chegg Study. Yet Chegg continues to violate Pearson's copyrights on a massive scale, including as to Pearson's highest-profile, signature textbooks.

9. Chegg's infringement harms students, authors, educators, learning institutions, and, of course, Pearson and other educational publishers. If left unchecked, Chegg will continue to infringe and cause damage. Accordingly, Pearson brings this action.

JURISDICTION AND VENUE

10. This is a civil action in which Pearson seeks injunctive relief and damages under the Copyright Act, 17 U.S.C. § 101, *et seq.* As such, the Court has original subject matter jurisdiction over Pearson's copyright infringement claims pursuant to 28 U.S.C. §§ 1331 and 1338(a).

11. This Court has personal jurisdiction over Chegg because Chegg continuously and systematically transacts business in New Jersey, it committed tortious acts in New Jersey, and Pearson's claims arise from those activities. Chegg transacts business in New Jersey by, *inter alia*, promoting its Chegg Study website, including the infringing content contained on the

website, to consumers in New Jersey; making the commercial and highly-interactive Chegg Study website, including the infringing content contained on the website, accessible to consumers in New Jersey; charging and profiting from subscriptions to consumers in New Jersey to access the Chegg Study website, including the infringing content contained on the website; distributing content from the Chegg Study website, including the infringing content, to consumers in New Jersey; and entering into commercial agreements with companies in New Jersey. As explained further herein, Chegg's infringement harms Pearson in New Jersey, and undermines students' learning in New Jersey.

12. Venue is proper in this District, *inter alia*, pursuant to 28 U.S.C. §§ 1391(b) and (c), because Chegg conducts, transacts, and/or solicits business in this District, and a substantial part of the acts of infringement and other events and omissions alleged herein occurred in this District.

GENERAL ALLEGATIONS

Pearson And Its Business

13. Pearson is a Delaware corporation with a principal place of business at 221 River Street, Hoboken, New Jersey 07030.

14. Pearson is the world's preeminent learning company, with global reach and market-leading businesses in education, business information, content development, and consumer publishing. Pearson serves students, educators, and learning institutions by providing quality content, assessment tools, and educational services across all media. From print and digital textbooks to next-generation online learning solutions, Pearson develops and provides a comprehensive range of traditional and innovative educational content and tools, on virtually all subjects, to maximize the learning experience for students. Pearson's educational products serve

millions of learners every year and are used by academic institutions and in other learning environments spanning the globe.

15. Pearson works closely with its authors to select, plan, create, write, edit, organize, and arrange the content within each of Pearson's textbooks, including as to the unique set of end-of-chapter questions that forms a critical component of each title. Pearson and its authors continuously work to edit the material in Pearson's textbooks and refine the manner that material is taught for subsequent textbook editions, with end-of-chapter questions playing a crucial role. New editions adopt and incorporate changes to the underlying substantive content and integrate new pedagogy to teach that content. Through this ongoing creative process, Pearson's textbooks—including the end-of-chapter questions contained in them—evolve and improve. In writing, updating, and revising its textbooks and end-of-chapter questions, Pearson and its authors make subjective choices as to the specific material to include and the manner and order in which to present that material. Pearson and its authors select, arrange, and emphasize content in Pearson's textbooks based on their expertise in the material and the needs of the scholastic community.

16. Pearson and its authors carefully develop richly original end-of-chapter questions to illustrate and reinforce key concepts, assess students' understanding of the material, and deepen student engagement in the learning process. Pearson's end-of-chapter questions are meticulously and strategically designed to reinforce key concepts taught in the textbooks, test students' comprehension of these issues, and, ultimately, improve students' understanding of the subject matter. These end-of-chapter questions are often hallmarks of Pearson's textbooks, and the availability, quality, and utility of such questions are frequently important considerations

when educators select which textbooks to adopt for their courses. Pearson textbooks typically include hundreds or thousands of distinctive questions.

17. In devising textbook questions, Pearson and its authors make numerous subjective choices. Pearson's questions reflect original expression in their wording and prose, and choices regarding particularized facts, fact patterns, and answer-choice combinations, as well as their order, arrangement, and coverage. Pearson's end-of-chapter questions, which are subject to peer review, correspond to and interact with the other subject matter content in the textbooks, enabling students to better learn and engage the content and therefore adding to the value of the products. Crafting these questions is just one aspect of the many creative decisions that Pearson and its authors make to express their unique views and understandings as to how to best teach the material in Pearson's textbooks. Along with the various other content contained in the textbooks, these end-of-chapter questions are Pearson's original creative work.

18. Pearson owns or has the exclusive license to, among others, the copyrights in innumerable valuable textbooks, including the textbooks in Exhibit A. The textbooks in Exhibit A are the subject of, or otherwise protected by, valid and subsisting U.S. copyright registrations. The textbooks in Exhibit A represent a non-exhaustive, representative list of Pearson's copyrighted textbooks, spanning a broad range of subject matters and including many of Pearson's most well-known and successful titles, which Chegg has infringed. The copyrights and copyright registrations for Pearson's textbooks include and protect the end-of-chapter questions contained in those textbooks.

19. One of Pearson's best-known and most successful titles is LISA A. URRY ET AL., CAMPBELL BIOLOGY (11th ed. 2017) ("CAMPBELL BIOLOGY"). First published in 1987, CAMPBELL BIOLOGY is now in its eleventh edition. Believed to be the most widely used science

textbook in the world, it is estimated to have been used by over 6.5 million students. Some sixty percent of Americans under the age of forty in the fields of biology, biotechnology, biology education, and medicine began their college studies with this textbook. Researching, writing, and updating CAMPBELL BIOLOGY involves momentous creative input. The textbook is organized into eight separate units, containing 56 individual chapters, each of which includes a set of unique questions to help students measure their understanding of the material in the chapter. CAMPBELL BIOLOGY features nearly 1,000 end-of-chapter questions, which are protected by copyright.

20. Another one of Pearson's highly-regarded and popular titles is ELAINE N. MARIEB ET AL., HUMAN ANATOMY & PHYSIOLOGY (11th ed. 2019) ("MARIEB HUMAN ANATOMY & PHYSIOLOGY"). Since first being published in 1989, Dr. Marieb's textbook is estimated to have been studied by more than 3 million healthcare professionals, and it is currently studied by students at hundreds of colleges and universities worldwide. For her work on anatomy and physiology textbooks, *Time Magazine* named Dr. Marieb to its 2016 list of the "100 Most-Read Female Writers in College Classes," alongside such authors as Virginia Woolf, Jane Austen, and Toni Morrison. The process of developing, drafting, and revising MARIEB HUMAN ANATOMY & PHYSIOLOGY has been a prodigious creative effort. The textbook is organized into five distinct units, containing 29 individual chapters, each of which is followed by a corresponding set of original end-of-chapter questions, which are specifically designed to elucidate key concepts and assess students' understanding of the material. In total, this title contains more than 800 such end-of-chapter questions, which are protected by copyright.

21. Another well-known and successful Pearson title is ELAYN MARTIN-GAY, BASIC COLLEGE MATHEMATICS (6th ed. 2019) ("MARTIN-GAY BASIC COLLEGE MATHEMATICS").

Professor Martin-Gay has taught mathematics for more than 25 years, authoring more than a dozen arithmetic and algebra texts and earning numerous teaching awards. First published in 1999, MARTIN-GAY BASIC COLLEGE MATHEMATICS showcases a student-focused approach, accessible writing style, and innovative teaching methods. Today, MARTIN-GAY BASIC COLLEGE MATHEMATICS is used by thousands of students annually. The textbook's 11 chapters contain a total of more than 7,500 individually-curated questions to aid students in learning the substantive material in each chapter, which are protected by copyright.

22. For each of the 150 Pearson exemplar titles identified in Exhibit A, Pearson has invested substantial sums of money, time, expertise, and creative talent to develop the textbook and draft the end-of-chapter questions contained in the textbook, which are protected by copyright.

23. Pearson invests significant resources annually to advertise and promote its educational products worldwide. More broadly, Pearson has invested decades of effort into building a relationship of trust with educators and a reputation of superior quality in the publishing industry.

24. The revenues from Pearson's sales and rentals of textbooks are important to its financial health and continued investment in working with authors to create and publish new works.

Chegg And Its Infringing Conduct

25. Chegg is a Delaware corporation with its principal place of business at 3990 Freedom Circle, Santa Clara, California 95054.

26. With its roots in buying and selling textbooks, Chegg has attempted to re-invent itself through its Chegg Study website, an online database with millions of off-the-shelf answers to end-of-chapter textbook questions and other problems. Unlike Pearson, Chegg does not create

its own textbooks or end-of-chapter questions. Instead, Chegg wholly relies on the textbooks and end-of-chapter questions created by publishers and authors, then sells answers to those questions to students for profit.

27. Chegg Study has comprehensive answer sets that together comprise 6 million answers to end-of-chapter textbook questions from 9,000 textbooks. The work of preparing these millions of answers is largely outsourced by Chegg to a force of 70,000 freelancers, with Chegg’s Terms of Use specifically disclaiming any responsibility for the “accuracy or quality” of the answers. Chegg charges students \$14.95 a month to access this ever-growing, searchable answer database. Chegg Study has become the company’s primary revenue driver, with Chegg’s subscription-based services—of which Chegg Study is the central offering—accounting for more than 80 percent of its revenues. The majority of Chegg’s \$644 million in total revenue in 2020 came from its sales of answers to students through Chegg Study.

28. Chegg promotes its Chegg Study website to students as a way to “[f]ind solutions for your homework[.]” Chegg Study enables students simply to copy and paste answers to the specific questions their educators selected from textbooks and assigned for homework.

29. Chegg’s selling of answers to students has been widely criticized among educators and in the news media, and Chegg has been implicated in cheating scandals at colleges and universities across the United States. A recent investigation by *Forbes* magazine described Chegg as a “superspreader” of cheating, with 48 of the 52 students interviewed by the magazine saying that they used Chegg Study to cheat. Indeed, *Forbes* reported that the term “Chegging” has become synonymous with cheating. Meanwhile, a recent Imperial College London study published in the *International Journal for Educational Integrity* concluded that Chegg’s purported academic integrity efforts are “not working[.]”

30. The infringement of Pearson's copyrights on the Chegg Study website is widespread and systematic. Chegg violates Pearson's copyrights with respect to each of the Pearson textbooks identified in Exhibit A, as well as numerous other copyrighted Pearson textbooks. Chegg directly infringes Pearson's exclusive rights of reproduction, preparation of derivative works, distribution to the public, and public display, in violation of 17 U.S.C. §§ 106(1)–(3), (5).

31. Chegg does not produce its own textbooks with original end-of-chapter questions. Instead, Chegg usurps the creative expression of publishers like Pearson, damaging the value of their educational products. The Chegg Study answers are based entirely on Pearson's questions, they incorporate protected expression from those questions, and they serve no purpose—and have no meaning or value—in the absence of Pearson's copyrighted works.

32. Chegg infringes Pearson's rights on a massive scale. For a given Pearson title, Chegg Study typically provides answers to hundreds or even thousands of end-of-chapter questions. Chegg Study generally covers all or most of the questions in the textbook, and it undermines the value and utility of those questions and that textbook to educators.

33. For example, a search for CAMPBELL BIOLOGY on Chegg Study reveals that Chegg provides 759 answers for that textbook alone.

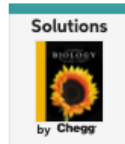


Find solutions for your homework

Search

home / study / science / biology / general biology / general biology solutions manuals /
campbell biology / 11th edition / chapter 55

We have 759 solutions for your book!



Campbell Biology

(11th Edition) [Edit edition](#)

34. Meanwhile, a search for MARIEB HUMAN ANATOMY & PHYSIOLOGY on Chegg Study returns 702 answers.

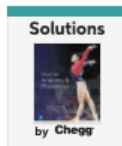


Find solutions for your homework

Search

home / study / anatomy and physiology / anatomy and physiology solutions manuals /
human anatomy & physiology / 11th edition / chapter 29

We have 702 solutions for your book!



Human Anatomy & Physiology

(11th Edition) [Edit edition](#)

35. Similarly, a search for MARTIN-GAY BASIC COLLEGE MATHEMATICS returns 7,827 answers.

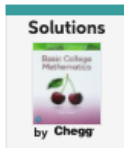


Find solutions for your homework

Search

home / study / math / precalculus / precalculus solutions manuals / basic college mathematics / 6th edition / chapter 11.5 / problem 66e

We have 7827 solutions for your book!



Basic College Mathematics

(6th Edition) [Edit edition](#)

36. The overall magnitude of Chegg’s infringement is staggering. In some cases, Chegg provides answers to more than 10,000 questions for a single Pearson textbook. Across the 150 Pearson titles listed in Exhibit A, Chegg provides hundreds of thousands of answers to Pearson’s end-of-chapter textbook questions. And this represents just a fraction of Chegg’s infringement.

37. In some cases, the Chegg Study answers simply copy and repeat Pearson’s end-of-chapter questions, or other copyrighted Pearson content, verbatim. In other instances, Chegg copies certain portions of Pearson’s original expression and paraphrases others. In all cases, the Chegg Study answers inherently rely on and incorporate Pearson’s protected expression.

38. Pearson’s end-of-chapter questions frequently employ detailed, fictitious fact patterns to illustrate key concepts and test students’ comprehension of those concepts. The Chegg Study answers often copy, repeat, paraphrase, and rely upon Pearson’s original fact patterns.

39. For example, in MARIEB HUMAN ANATOMY & PHYSIOLOGY, Pearson’s “Review Question” 29 in Chapter 23 asks students:

A baby is admitted to the hospital with a history of diarrhea and watery feces occurring over the last three days. The baby has sunken fontanelles, indicating extreme dehydration. Tests indicate that the baby has a bacterium-induced colitis, and antibiotics are prescribed. Because of the baby's loss of intestinal juices, do you think that his blood pH would indicate acidosis or alkalosis? Explain your reasoning.

The Chegg Study answer to Pearson's question references the question directly and begins by mirroring Pearson's language almost word-for-word:

A baby is admitted in a hospital who is suffering with a history of diarrhoea and watery faeces occurring over last three days. The baby has sunken fontanelles, indicating extreme dehydration. . . . Tests indicate that the baby is suffering with bacterium induced colitis, and antibiotics are prescribed. This is due to loss of intestinal juices. . . .

Chegg then provides an answer solving the problem, undermining the learning process.

A student looking to "Chegg" an assigned question can merely search the question on

Chegg and copy and paste the answer into the assignment.

40. By way of further example, Pearson's "Review Question" 25 in Chapter 13 of MARIEB HUMAN ANATOMY & PHYSIOLOGY queries:

Fumiko, a 19-year-old nursing student, had had a runny nose and sore throat for several days. Upon waking, her face felt "twisted." When she examined her face in the mirror, she noticed that the right side looked "droopy" and she was unable to move the facial muscles on that side. This made it difficult to speak clearly or eat. Which cranial nerve was affected and on which side? What is a common cause of this condition?

The Chegg Study answer once again directly references the question, repeating and incorporating Pearson's fictitious fact pattern, nearly verbatim:

. . . A patient of 19-year-old nursing student her face felt "twisted" when she was walking [sic] and she examined her face in the mirror. She noticed that the right side looked "droopy" and she was unable to move the facial muscles on that side

Then, Chegg provides an answer to Pearson's question, again shortcutting the learning process.

41. Similarly, Pearson's "Review Question" 30 in Chapter 15 of the same title asks:

Mrs. Orlando has been noticing flashes of light and tiny specks in her right visual field. When she begins to see a "veil" floating before her right eye, she makes an appointment to see the eye doctor. What is your diagnosis? Is the condition serious? Explain.

Again, Chegg repeats and incorporates Pearson's original fact pattern before answering the question:

The patient O. has been noticing flashes of light and tiny specks in her right visual field. She begins to see a floating veil before her right eye. The diagnosis may be retinal detachment. . . .

42. Chegg's provision of answers to Pearson's end-of-chapter questions from other titles follows the same pattern. For instance, in MARTIN-GAY BASIC COLLEGE MATHEMATICS, Pearson's "Chapter Review" Question 181 in Chapter 1 asks students:

A manufacturer of drinking glasses ships his delicate stock in special boxes that can hold 32 glasses. If 1714 glasses are manufactured, how many full boxes are filled. Are there any glasses left over?

The Chegg Study answer copies the language of Pearson's question before answering the question:

Consider that a manufacturer of drinking glasses ships his delicate stock in special boxes that can hold 32 glasses. If 1714 are manufactured, number of full boxes are filled is $1714 \div 32$

43. Similarly, Pearson's "Exercise" 55 in Chapter 1.8 of the same title asks:

The Meishs' yard is in the shape of a rectangle and measures 50 feet by 75 feet. In their yard, they have a rectangular swimming pool that measures 15 feet by 25 feet.

a. Find the area of the entire yard.

b. Find the area of the swimming pool.

c. Find the area of the yard that is not part of the swimming pool.

The Chegg Study answer to Pearson's question again references the question directly and copies Pearson's language:

It is given that Meish's yard is in the shape of rectangle and has a swimming pool in it. The dimensions of the plot and the pool are given to be 50 feet by 75 feet and 15 feet by 25 feet respectively. We are required to find the following:

(i) The area of the entire yard.

(ii) The area of the swimming pool.

(iii) The area of the yard excluding the pool's area. . . .

44. Even where the Chegg Study answers do not repeat Pearson's questions verbatim or paraphrase them, those answers are based upon, and are necessarily derived from, Pearson's questions and other protected expression from Pearson's textbooks. The answers are a byproduct of the questions, and a result of the creativity set forth in the questions. Further, by providing answers to the questions, Chegg lessens the value of those questions as pedagogical tools and violates Pearson's right to derive and market answers to the questions.

45. In addition to the written answers on Chegg Study, Chegg also provides video answers to many of Pearson's questions on Chegg Study. Like the written answers, these video answers infringe Pearson's copyrights, often to an even greater extent.

46. For example, in Chapter 1 of CAMPBELL BIOLOGY, Pearson's "Test Your Understanding" Question 6 asks students:

Which of the following is an example of qualitative data?

A. The fish swam in a zigzag motion.

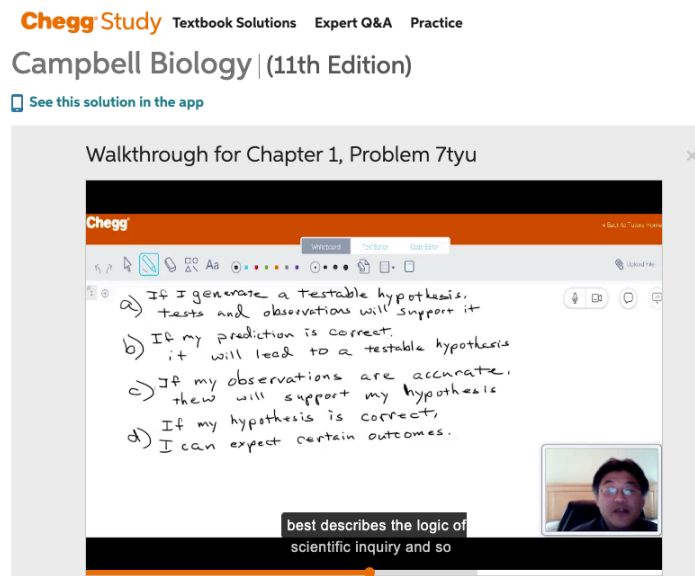
B. The contents of the stomach are mixed every 20 seconds.

C. The temperature decreased from 20°C to 15°C.

D. The six pairs of robins hatched an average of three chicks each.

The Chegg Study video answer repeats the question word-for-word—including each of the four unique multiple-choice options—before providing students the answer to the question.

47. The next Chegg Study video answer, to Pearson's "Test Your Understanding" Question 7 from Chapter 1 of the same title, goes even further—repeating the question and each of the four multiple-choice options verbatim, before reproducing those multiple-choice options onscreen:



48. Prior to preparing the Chegg Study answers to Pearson's questions, Chegg obtained or had in its possession copies of Pearson's textbooks, including the end-of-chapter questions contained in them.

49. Chegg referred to and/or relied upon Pearson's textbooks and end-of-chapter questions in preparing answers to Pearson's questions.

50. The Chegg Study answers reproduce protected material from Pearson's questions and contain a significant amount of protected expression from Pearson's questions.

51. In preparing the answers, Chegg copied and paraphrased the text of Pearson's questions, along with Pearson's myriad choices as to what to reinforce, how, in what order, and more.

52. Chegg has sold answers to Pearson's end-of-chapter questions as set forth herein in violation of Pearson's copyrights from at least June 1, 2021 to the present. The date that the infringement commenced will be determined during discovery.

53. Besides violating Pearson's copyrights through its sale of answers to Pearson's end-of-chapter questions, Chegg has also without authorization reproduced, distributed, and/or displayed Pearson's end-of-chapter questions verbatim preceding those answers. This includes Chegg's unlicensed reproduction, distribution, and display of Pearson's questions to non-Chegg subscribers and individuals outside of North America, beginning on a date unknown and continuing until at least June 1, 2021, as well as Chegg's unlicensed reproduction, distribution, and display of some questions even to the present. Here too, the date that the infringement commenced will be determined during discovery.

54. Chegg's ongoing infringement of Pearson's copyrights harms Pearson in many ways. In particular, Chegg's conduct undermines the value of Pearson's textbooks and end-of-chapter questions as a learning tool for students and as an assessment tool for educators, jeopardizes the adoption of Pearson's textbooks by educators, harms Pearson's reputation as a source of rigorously-developed teaching materials, and impairs Pearson's educational mission more broadly.

FIRST CLAIM FOR RELIEF
Direct Copyright Infringement—17 U.S.C. § 106(1)
Unauthorized Reproduction

55. Pearson re-alleges and incorporates by reference each and every allegation set forth in the preceding paragraphs 1 through 53 of this Complaint.

56. Pearson's textbooks, including its end-of-chapter questions, constitute original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. § 101, *et seq.*, and they have been duly registered by Pearson with the United States Copyright Office. At all

relevant times, Pearson has been and still is the owner of all rights, title, and interest in and to its copyrights in these works.

57. Chegg has copied and reproduced Pearson's end-of-chapter questions from Pearson's copyrighted textbooks without authorization.

58. As detailed above, Chegg, without permission or consent of Pearson, has made unauthorized reproductions of Pearson's works. Such activity constitutes infringement of Pearson's registered copyrights and exclusive rights under copyright in violation of the Copyright Act, 17 U.S.C. §§ 106(1) and 501.

59. Chegg's unlawful conduct, as set forth above, was deliberate, intentional, knowing, malicious, and willful. As a result of Chegg's unlawful and deliberate conduct as set forth above, Pearson has been, and will continue to be, damaged.

60. Chegg's actions described above, which are ongoing, have caused and will continue to cause irreparable damage to Pearson, for which Pearson has no remedy at law. Unless Chegg is restrained by this Court from continuing its infringement of Pearson's copyrights, these injuries will continue to occur in the future. Pearson is accordingly entitled to injunctive relief restraining Chegg from further infringement.

SECOND CLAIM FOR RELIEF
Direct Copyright Infringement—17 U.S.C. § 106(2)
Unauthorized Derivative Work

61. Pearson re-alleges and incorporates by reference each and every allegation set forth in the preceding paragraphs 1 through 53 of this Complaint.

62. Pearson's textbooks, including its end-of-chapter questions, constitute original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. § 101, *et seq.*, and they have been duly registered by Pearson with the United States Copyright Office. At all

relevant times, Pearson has been and still is the owner of all rights, title, and interest in and to its copyrights in these works.

63. Chegg has prepared unauthorized derivative works from Pearson's copyrighted textbooks without authorization.

64. As detailed above, Chegg, without permission or consent of Pearson, has prepared unauthorized derivative works based on Pearson's original works. Such activity constitutes infringement of Pearson's registered copyrights and exclusive rights under copyright in violation of the Copyright Act, 17 U.S.C. §§ 106(2) and 501.

65. Chegg's unlawful conduct, as set forth above, was deliberate, intentional, knowing, malicious, and willful. As a result of Chegg's unlawful and deliberate conduct as set forth above, Pearson has been, and will continue to be, damaged.

66. Chegg's actions described above, which are ongoing, have caused and will continue to cause irreparable damage to Pearson, for which Pearson has no remedy at law. Unless Chegg is restrained by this Court from continuing its infringement of Pearson's copyrights, these injuries will continue to occur in the future. Pearson is accordingly entitled to injunctive relief restraining Chegg from further infringement.

THIRD CLAIM FOR RELIEF
Direct Copyright Infringement—17 U.S.C. § 106(3)
Unauthorized Distribution

67. Pearson re-alleges and incorporates by reference each and every allegation set forth in the preceding paragraphs 1 through 53 of this Complaint.

68. Pearson's textbooks, including its end-of-chapter questions, constitute original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. § 101, *et seq.*, and they have been duly registered by Pearson with the United States Copyright Office. At all

relevant times, Pearson has been and still is the owner of all rights, title, and interest in and to its copyrights in these works.

69. Chegg has distributed Pearson's end-of-chapter questions from Pearson's copyrighted textbooks without authorization.

70. Chegg has distributed derivative works of Pearson's copyrighted textbooks without authorization.

71. As detailed above, Chegg, without permission or consent of Pearson, makes unauthorized distributions both of Pearson's works and derivative works of Pearson's works. Such activity constitutes infringement of Pearson's registered copyrights and exclusive rights under copyright in violation of the Copyright Act, 17 U.S.C. §§ 106(3) and 501.

72. Chegg's unlawful conduct, as set forth above, was deliberate, intentional, knowing, malicious, and willful. As a result of Chegg's unlawful and deliberate conduct as set forth above, Pearson has been, and will continue to be, damaged.

73. Chegg's actions described above, which are ongoing, have caused and will continue to cause irreparable damage to Pearson, for which Pearson has no remedy at law. Unless Chegg is restrained by this Court from continuing its infringement of Pearson's copyrights, these injuries will continue to occur in the future. Pearson is accordingly entitled to injunctive relief restraining Chegg from further infringement.

FOURTH CLAIM FOR RELIEF
Direct Copyright Infringement—17 U.S.C. § 106(5)
Unauthorized Display

74. Pearson re-alleges and incorporates by reference each and every allegation set forth in the preceding paragraphs 1 through 54 of this Complaint.

75. Pearson's textbooks, including its end-of-chapter questions, constitute original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. § 101, *et seq.*,

and they have been duly registered by Pearson with the United States Copyright Office. At all relevant times, Pearson has been and still is the owner of all rights, title, and interest in and to its copyrights in these works.

76. Chegg has displayed publicly Pearson's end-of-chapter questions from Pearson's copyrighted textbooks without authorization.

77. Chegg has displayed publicly derivative works of Pearson's copyrighted textbooks without authorization.

78. As detailed above, Chegg, without permission or consent of Pearson, displays without authorization both Pearson's works and derivative works of Pearson's works. Such activity constitutes infringement of Pearson's registered copyrights and exclusive rights under copyright in violation of the Copyright Act, 17 U.S.C. §§ 106(5) and 501.

79. Chegg's unlawful conduct, as set forth above, was deliberate, intentional, knowing, malicious, and willful. As a result of Chegg's unlawful and deliberate conduct as set forth above, Pearson has been, and will continue to be, damaged.

80. Chegg's actions described above, which are ongoing, have caused and will continue to cause irreparable damage to Pearson, for which Pearson has no remedy at law. Unless Chegg is restrained by this Court from continuing its infringement of Pearson's copyrights, these injuries will continue to occur in the future. Pearson is accordingly entitled to injunctive relief restraining Chegg from further infringement.

PRAYER FOR RELIEF

By reason of the acts and circumstances alleged above, Pearson seeks relief from this Court as follows:

1. Judgment on each of the claims set forth above, including that Chegg's

infringement of Pearson's works was intentional and willful;

2. An order requiring Chegg to pay Pearson such damages as Pearson has sustained as a consequence of Chegg's unlawful acts as alleged above, including Pearson's actual damages and Chegg's profits from the infringement, or, in the alternative, statutory damages, at Pearson's election, pursuant to 17 U.S.C. § 504;

3. An order enjoining Chegg and all persons who are in active concert or participation with Chegg from further infringing upon Pearson's copyrights, pursuant to 17 U.S.C. § 502;

4. An order requiring Chegg to deliver up for destruction all products, packaging, labels, literature, advertising, and other material made or used in violation of Pearson's copyrights, pursuant to 17 U.S.C. § 503;

5. Pearson's costs and attorneys' fees, pursuant to 17 U.S.C. § 505;

6. Prejudgment and post-judgment interest at the applicable rate; and

7. Such other and further relief as the Court deems proper.

JURY TRIAL DEMAND

Pearson hereby requests a trial by jury.

Dated: May 10, 2023

Respectfully submitted,

/s/ Karen A. Confoy

Karen A. Confoy

Paul W. Kalish

FOX ROTHSCHILD LLP

Princeton Pike Corporate Center

997 Lenox Drive

Lawrenceville, NJ 08648

Phone: (609) 844-3033

kconfoy@foxrothschild.com

pkalish@foxrothschild.com

OF COUNSEL:

Matthew J. Oppenheim (*pro hac vice*)

Scott A. Zebrak (*pro hac vice*)

Jeffrey M. Gould (*pro hac vice*)

Nicholas C. Hailey (*pro hac vice*)

Daryl L. Kleiman (*pro hac vice*)

OPPENHEIM + ZEBRAK, LLP

4530 Wisconsin Avenue, NW, 5th Floor

Washington, DC 20016

Phone: (202) 480-2999

matt@oandzlaw.com

scott@oandzlaw.com

jeff@oandzlaw.com

nick@oandzlaw.com

dkleiman@oandzlaw.com

*Attorneys for Plaintiff Pearson Education,
Inc.*

CERTIFICATE OF SERVICE

The undersigned attorney certifies that a copy of Plaintiff Pearson Education, Inc.'s Amended Complaint was filed via ECF and served on all counsel of record by electronic mail on May 10, 2023.

Dated: May 10, 2023

/s/ Karen A. Confoy
Karen A. Confoy

	Title	Copyright Registration Number	Copyright Registration Date
1	Jay Lehmann, A Pathway to Introductory Statistics, 1st ed.	TX0008184355	2015-10-13
2	Allen Angel, A Survey of Mathematics with Applications, 10th ed.	TX0008198421 TX0007521291 TX0006839941 TX0005957678 TX0005244802 TX0004453918 TX0003507806 TX0002511156 TX0001550134 TX0000650535	2015-11-13
3	Marshall Romney, Accounting Information Systems, 14th ed.	TX0008440473 TX0008438242 TX0007330306 TX0006996489 TX0006201168 TX0005603252 TX0004385850 TX0003654487 TX0002754207 TX0002144340 TX0000895071 TX0000060137 A00000523883	2017-07-17
4	Robert Blitzer, Algebra and Trigonometry, 6th ed.	TX0008448208 TX0007669928 TX0007031572 TX0005835871 TX0005285674	2017-07-31
5	Marvin Bittinger, Algebra and Trigonometry: Graphs and Models, 6th ed.	TX0008404881 TX0006844308 TX0006180015 TX0005196215	2017-03-02
6	Eric Chaisson, Astronomy Today Volume 1: The Solar System, 9th ed.	TX0008471384 TX0007887081 TX0006606237 TX0006606238 TX0006083003 TX0005484632 TX0004818992 TX0004479195 TX0004317532 TX0003557037	2017-09-13
7	Karen Timberlake, Basic Chemistry, 6th ed.	TX0008766300 TX0008771949 TX0008227997 TX0007681991	2019-06-25

	Title	Copyright Registration Number	Copyright Registration Date
		TX0007216335 TX0006576720 TX0006084782	
8	Elayn Martin-Gay, Basic College Mathematics, 6th ed.	TX0008553137 TX0008005351 TX0007632484 TX0005077217 TX0004890614	2018-03-09
9	Allyn Washington, Basic Technical Mathematics, 11th ed.	TX0008471614 TX0007722478 TX0006894398 TX0006085849 TX0005085323 TX0004045919 TX0002733791 TX0001552914 TX0001557970 TX0000045986 TX0000045985 RE0000786711 A00000157417 RE0000596180	2017-09-06
10	Jeff Hardin, Becker's World of the Cell, 9th ed.	TX0008210319 TX0007337567 TX0007376910 PA0001105864 TX0005077038 TX0004208404 TX0003040002 TX0001828563	2016-01-08
11	Elayn Martin-Gay, Beginning & Intermediate Algebra, 6th ed.	TX0008334002 TX0007081345 TX0005957583 TX0005300719 TX0004177920	2016-09-14
12	John Tobey, Beginning & Intermediate Algebra, 5th ed.	TX0008399611 TX0007535955 TX0007007133 TX0006850091	2017-03-02
13	Kendall Martin, Better Business, 5th ed.	TX0008586052 TX0008056694 TX0007711703 TX0007335519 TX0007086787	2017-11-13
14	Judith Goodenough, Biology of Humans: Concepts,	TX0008241495 TX0007694315	2016-03-04

	Title	Copyright Registration Number	Copyright Registration Date
14	Applications, and Issues, 6th ed.	TX0007335231 TXu001605079	2010-03-04
15	Gerald Audesirk, Biology: Life on Earth, 12th ed.	TX0008767550 TX0008232565 TX0007698741 TX0007169366 TX0005335863 TX0004591195 TX0003380795 TX0002485903 TX0001789525	2019-07-15
16	Marc Triola, Biostatistics for the Biological and Health Sciences, 2d ed.	TX0008487377 TX0006288268	2017-10-02
17	Michael Madigan, Brock Biology of Microorganisms, 15th ed.	TX0008501797 TX0007894748 TX0007335382 TX0006992056 TX0005564202 TX0005064898 TX0003780785 TX0002974100 TX0002260120 TX0001310172 TX0000182062 RE0000862152 A00000523858 RE0000783674 A00000125367	2017-09-21
18	Barbara Shwom, Business Communication: Polishing Your Professional Presence, 4th ed.	TX0008591990 TX0008123001 TX0007702466 TX0007329527	2018-06-08
19	Henry Cheeseman, Business Law, 10th ed.	TX0008552945 TX0008058261 TX0007521568 TX0007098708 TX0004638327 TX0004051063 TX0003964679 TX0003431940 TX0003284574	2018-03-05
		TX0008602155 TX0007908873 TX0007334394 TX0006977737 TX0006121389 TX0005559779	

	Title	Copyright Registration Number	Copyright Registration Date
20	Gary Clendenen, Business Mathematics, 14th ed.	TX0005077598 TX0004709495 TX0004668998 TX0002705380 TX0001992788 TX0001084934 TX0000250340 A00000505819	2018-06-08
21	Richard De Veaux, Business Statistics, 4th ed.	TX0008737174 TX0007929465 TX0007264188	2019-02-25
22	David Groebner, Business Statistics: A Decision-Making Approach, 10th ed.	TX0008498574 TX0007699113 TX0007166138 TX0006837283 TX0006139378 TX0005898856 TX0005229584 TX0003487991 TX0002498140 TX0001543674 TX0000698638	2017-09-21
23	Raymond Greenwell, Calculus for the Life Sciences, 2d ed.	TX0007888202 TX0005637343	2014-05-08
24	Margaret Lial, Calculus with Applications, 11th ed.	TX0008271175 TX0006926966 TX0006019137 TX0005377808 TX0004715998 TX0003681976 TX0002518321 TX0001531573 TX0000524024 A00000608781	2016-04-21
25	William Briggs, Calculus: Early Transcendentals, 3d ed.	TX0008589494 TX0007919767 TX0007523630	2018-06-08
26	Lisa Urry, Campbell Biology, 11th ed.	TX0008472354 TX0008307770 TX0007304625 TX0006959297 PA0001289603 TX0005482385 TX0004862374 TX0004206651 TX0003558382 TX0002751960	2017-08-14

	Title	Copyright Registration Number	Copyright Registration Date
		TX0002094016	
27	Rebecca Orr & Lisa A. Urry, Campbell Biology in Focus, 3d ed.	TX0008764205 TX0008217662 TX0007684987	2019-07-15
28	Eric Simon, Campbell Biology: Concepts & Connections, 9th ed.	TX0008539826 TX0007883763 TX0007335537 TX0006984015 TX0006170178 PA0001105866 TX0004961871 TX0004401548 TX0003731723	2017-09-29
29	Nivaldo Tro, Chemistry: A Molecular Approach, 5th ed.	TX0008764178 TX0008770329 TX0008755848 TX0007679500 TX0007194727 TX0007361179	2019-07-15
30	Karen Timberlake, Chemistry: An Introduction to General, Organic, and Biological Chemistry, 13th ed.	TX0008478279 TX0007885354 TX0007327157 TX0006213218 PA0001105865 TX0004926164 TX0003234971 TXu000354580 TX0001083068 TX0000233220 A00000775770	2017-09-28
31	Theodore Brown, Chemistry: The Central Science, 14th ed.	TX0008458230 TX0007977572 TX0007328609 TX0006862056 TX0006162946 TX0005494886 TX0005060469 TX0003763634 TX0003000112 TX0002253349 TX0001486383 TX0000619765 A00000824008	2017-08-14
		TX0008051598 TX0007521197 TX0007074689 TX0005917402	

	Title	Copyright Registration Number	Copyright Registration Date
32	Jeffrey Slater, College Accounting: A Practical Approach, 13th ed.	TX0005805084 TX0005411724 TX0004816050 TX0004842743 TX0004839262 TX0004221815 TXu000543604 TX0003879788 TX0002300190 TX0001271106 TX0000320777	2015-04-03
33	Robert Blitzer, College Algebra, 7th ed.	TX0008454915 TX0007679656 TX0005702218 TX0005291424 TX0004675234	2017-07-31
34	Marvin Bittinger, College Algebra, 5th ed.	TX0008088509 TX0007335417 TX0006506039 TX0005956422 TX0005476503	2015-04-20
35	Jeffrey Bennett, Using & Understanding Mathematics: A Quantitative Reasoning Approach, 7th ed.	TX0008592235 TX0008016961 TX0007147970 TX0006514812 TX0005959737 TX0005366384 TX0004091799	2018-06-08
36	Mark Dugopolski, College Algebra, 6th ed.	TX0007883759 TX0006307787 TX0005533139 TX0004889462 TX0004121388	2014-03-27
37	Margaret Lial, College Algebra and Trigonometry, 6th ed.	TX0008382051 TX0007563807 TX0006843511 TX0005955846 TX0005236857	2017-01-27
38	Lisa Yocco, College Algebra in Context with Applications for the Managerial, Life, and Social Sciences, 5th ed.	TX0008244820 TX0007553847 TX0007383425 TX0006337065 TX0005900702	2016-03-04
39	Gary Rockswold, College Algebra with Modeling & Visualization, 6th ed.	TX0008501793 TX0007684992 TX0005473168	2017-09-21

	Title	Copyright Registration Number	Copyright Registration Date
		TX0004930337	
40	Philip Adams, College Physics, 11th ed.	TX0008764251 TX0008764151 TX0008022934 TX0007335918 TX0006354349 TX0002830295 TX0001869497 TX0000416122 A00000576739 RE0000413677 A00000423800 RE0000070741 A00000068096 RE0000031461 A00000059580	2019-07-15
41	Randall D. Knight, College Physics: A Strategic Approach, 4th ed.	TX0008670418 TX0007946467 TX0007078607 TX0006479572	2018-10-02
42	Eugenia Etkina, College Physics: Explore and Apply, 2d ed.	TX0008573854 TX0007771735	2018-03-29
43	Keith Ross, Computer Networking: A Top-Down Approach, 7th ed.	TX0008387099 TX0007536257 TX0007248529 TX0006574323 TX0005982429 TX0005589429 TX0005028267	2017-04-03
44	Paul Hewitt, Conceptual Physical Science, 6th ed.	TX0008249808 TX0007499008 TX0006997656 TX0005796467 TX0004317904 TX0004886133	2016-03-04
45	Michael Solomon, Consumer Behavior: Buying, Having, and Being, 12th ed.	TX0008384229 TX0007920898 TX0007511979 TX0007139419 TX0006936098 TX0006357727 TX0005913295 TX0005412870 TX0004816047 TX0004146854 TX0003847690	2017-02-15

	Title	Copyright Registration Number	Copyright Registration Date
46	Frank Schmalleger, Criminal Justice: A Brief Introduction, 13th ed.	TX0008786038 TX0008537303 TX0008049266 TX0007729566 TX0007335511 TX0006954361 TX0006521311 TX0006189360 TX0006145698 TX0005770862 TX0005737168 TX0005250591 TX0004404438 TX0003738293	2019-08-29
47	Richard Saferstein, Criminalistics: An Introduction to Forensic Science, 12th ed.	TX0008541729 TX0008353477 TX0007901323 TX0007160352 TX0006489651 TX0005807408 TX0005275733 TX0004509618 TX0003855564 TX000394640 TX0001997723 TX0000661904 RE0000915512 A00000816050	2017-10-27
48	David Whetten, Developing Management Skills, 9th ed.	TX0008104703 TX0007168356 TX0006525546 TX0006021574 TX0005430503 TX0004751996 TX0004035776 TX0001336833	2015-05-29
49	Marvin Bittinger, Developmental Mathematics, 9th ed.	TX0008142183 TX0005815668 TX0004206658 TX0003383022 TX0002288242 TX0001326655	2015-08-04
		TX0008546773 TX0007980770 TX0007341351 TX0006900268 TX0006464772	

	Title	Copyright Registration Number	Copyright Registration Date
50	Frederick Lutgens, Earth Science, 15th ed.	TX0005564241 TX0005057475 TX0004478551 TX0003632498 TX0002958601 TX0002350681 TX0001464561 TX0000866551 TX0000223653	2018-01-22
51	Glenn Hubbard, Economics, 6th ed.	TX0008382058 TX0008573695 TX0007940712 TX0007503367 TX0007144155 TX0006852345 TX0006989466 TX0006352022	2017-02-15
52	Anita Woolfolk, Educational Psychology, 14th ed.	TX0008571544 TX0008242451 TX0007501176 TX0007396792 TX0006457957 TX0005991275 TX0005266041 TX0005719458 TX0004013534 TX0003375907 TX0002722630 TX0002007879 TX0001268206 TX0000446587	2018-03-09
53	James Nilsson, Electric Circuits, 11th ed.	TX0008712906 TX0007856874 TX0007230096 TX0006593901 TX0006480516 TX0005053823 TX0005276118 TX0004355261 TX0003451952 TX0002705392 TX0001798953	2018-12-06
	Allen Hambley, Electrical Engineering: Principles &	TX0008480111 TX0007711377 TX0007236702	

	Title	Copyright Registration Number	Copyright Registration Date
54	Anan Hambley, Electrical Engineering: Principles & Applications, 7th ed.	TX0006592738 TX0005968393 TX0005484641 TX0004511344	2017-09-21
55	David Buchla, Electronics Fundamentals: Circuits, Devices & Applications, 8th ed.	TX0007048552 TX0006358654 TX0005162545 TX0004591978 TX0003892938 TX0002903029 TX0002029090	2009-09-22
56	Barbara Johnson, Elementary and Intermediate Algebra: Concepts and Applications, 7th ed.	TX0008484594 TX0007702807 TX0007017046 TX0006148184 TX0005450636 TX0004749460 TX0004176223	2017-09-06
57	Mario Triola, Elementary Statistics, 13th ed.	TX0008529881 TX0007681235 TX0007322780 TX0006288628 TX0005740881 TX0006260778 TX0005160151 TX0004667126 TX0004143030 TX0003556672 TX0002565550 TX0001744071 TX0001249788 TX0000515779	2017-10-02
58	Ron Larson, Elementary Statistics: Picturing the World, 7th ed.	TX0008558429 TX0007897892 TX0007380913 TX0007001731 TX0006310643 TX0005522934 TX0005069439	2018-03-09
59	Bruce Barringer, Entrepreneurship: Successfully Launching New Ventures, 6th ed.	TX0008589490 TX0008106036 TX0007468075 TX0007048150 TX0006576818 TX0006139616	2018-06-08

	Title	Copyright Registration Number	Copyright Registration Date
60	Richard Wright, Environmental Science: Toward A Sustainable Future, 13th ed.	TX0008232929 TX0007218997 TX0005973222 TX0005424496 TX0004988371 TX0004623758 TX0004596791 TX0003477672 TX0002851628 TX0002008035 A00000619751	2016-02-16
61	Paula Bruice, Essential Organic Chemistry, 3d ed.	TX0008127001 TX0007150584	2015-07-10
62	Richard Wolfson, Essential University Physics: Volume 1, 4th ed.	TX0008772712 TX0008770521 TX0008118187 TX0008118193 TX0007169934 TX0007169854	2019-06-26
63	Norman Scarborough, Essentials of Entrepreneurship and Small Business Management, 9th ed.	TX0008583574 TX0008050909 TX0007727257 TX0007172559 TX0006557955 TX0005961571 TX0005959491 TX0004587374 TX0003748753	2018-05-04
64	Edward Tarbuck, Essentials of Geology, 13th ed.	TX0008443560 TX0007847893 TX0007329588 TX0006900256 TX0006904749 TX0005551071 TX0004980763 TX0004640069 TX0004090820 TX0003178924 TX0000262944 TX0001752163 TX0000920488	2017-08-14
		TX0008536639 TX0007882455 TX0007349311 TX0007004017	

	Title	Copyright Registration Number	Copyright Registration Date
65	Elaine Marieb, Essentials of Human Anatomy & Physiology, 12th ed.	TX0006114082 PA0001116795 TX0004840071 TX0004441222 TX0003653488 TX0003080191 TX0002268197 TX0001336687	2017-11-03
66	Harold Thurman, Essentials of Oceanography, 13th ed.	TX0008770847 TX0008359904 TX0007727240 TX0007218993 TX0006900252 TX0006494519 TX0005458625 TX0004942420 TX0004225130 TX0003385591 TX0002763395 TX0001924651 TX0001064081	2019-07-12
67	C. William Thomas, Financial Accounting, 12th ed.	TX0008552941 TX0008236734 TX0007944977 TX0007503382 TX0007078632 TX0006991202 TX0006148637 TX0005723883 TX0004481386 TX0003994996 TX0003252567	2018-03-05
68	Raymond Brooks, Financial Management: Core Concepts, 4th ed.	TX0008582828 TX0008049364 TX0007503410 TX0007045311	2018-05-04
69	Larry Goldstein, Finite Mathematics & Its Applications, 12th ed.	TX0008476540 TX0007693388 TX0005738264 TX0005783144 TX0005280517 TX0004806339 TX0004589376 TX0003983957 TX0003066014	2017-09-18

	Title	Copyright Registration Number	Copyright Registration Date
		TX0002220019 TX0001264534 TX0000400298	
70	Margaret Lial, Finite Mathematics and Calculus with Applications, 10th ed.	TX0008242432 TX0004709841 TX0003807315 TX0002554941 TX0002545551 TX0001538175	2016-03-04
71	Neil Carlson, Foundations of Behavioral Neuroscience, 9th ed.	TX0007716532 TX0006833526 TX0005997937 TX0005425694 TX0004930578 TX0003348577	2013-04-17
72	Dennis Tasa, Foundations of Earth Science, 8th ed.	TX0008326924 TX0007218982 TX0006900792 TX0005294826 TX0004980755 TX0004248822	2016-07-15
73	R. Nagle, Fundamentals of Differential Equations, 9th ed.	TX0008519034 TX0008476364 TX0007165366 TX0007471696 TX0005800226 TX0004242396 TX0003509901 TX0004217730 TX0002478991 TX0003405622 TX0001793257	2017-09-22
74	John McMurry, Fundamentals of General, Organic, and Biological Chemistry, 8th ed.	TX0008414577 TX0007557239 TX0007120274 TX0006550806 TX0005578324 TX0005027570 TX0004242678 TX0004237903 TX0003277283	2017-05-08
75	Gary Dessler, Fundamentals of Human Resource Management, 5th ed.	TX0008591988 TX0008069628 TX0007721242 TX0007320697	2018-06-08

	Title	Copyright Registration Number	Copyright Registration Date
		TX0006921809	
76	Carter Stanfield, Fundamentals of HVACR, 3d ed.	TX0008234894 TX0007549883 TX0007002131	2016-02-16
77	Scott Smart, Fundamentals of Investing, 13th ed.	TX0008396691 TX0007688974 TX0007128317 TX0006506102 TX0005956260 TX0005800227 TX0005434153 TX0004800789 TX0004208317 TX0003501758 TX0002344861 TX0001588150 TX0000712055	2017-05-01
78	John Bowman, Genetic Analysis: An Integrated Approach, 3d ed.	TX0008583227 TX0008004174 TX0007531767	2018-04-13
79	Robert Christopherson, Geosystems: An Introduction to Physical Geography, 10th ed.	TX0008476688 TX0008004960 TX0007329044 TX0006894064 TX0006226544 TX0005957472 TX0005555645 TX0005068396 TX0004446309 TX0003739380 TX0003229223	2017-08-15
80	Tanya Littrell, Get Fit, Stay Well!, 4th ed.	TX0008540301 TX0007856370 TX0007501171 TX0006913722	2017-10-30
81	Warren Keegan, Global Marketing, 9th ed.	TX0008270604 TX0007856366 TX0007751222 TX0007524889 TX0005450507 TX0004875581 TX0007150838 TX0006848362 TX0002494495 TX0004028201 TX0006126751	2016-11-03

	Title	Copyright Registration Number	Copyright Registration Date
		TX0005606777 TX0005069171 TX0004440071	
82	William Wyckoff, Globalization and Diversity: Geography of a Changing World, 6th ed.	TX0008772562 TX0008416343 TX0007219135 TX0006052326	2019-07-12
83	Ella Mae Matsumura, Horngren's Accounting, 12th ed.	TX0008464965 TX0008115390 TX0007685811 TX0007346291 TX0006522916 TX0005917362 TX0005311525 TX0004816045 TX0005079517 TX0003472031 TX0003215992 TX0002498057	2017-08-24
84	Madhav Rajan, Horngren's Cost Accounting: A Managerial Emphasis, 16th ed.	TX0008469320 TX0007898189 TX0007335836 TX0007005297 TX0006311827 TX0005501847 TX0005053824 TX0004483535 TX0004773184 TX0003842413 TX0003763603 TX0003154285 TX0002991534 TX0002029088 TX0000848226 RE0000915508 A00000850379 RE0000824617 A00000336927 RE0000699868 A00000902232 RE0000490314 A00000552797	2017-08-24
85	Ella Mae Matsumura, Horngren's Financial & Managerial Accounting, 6th ed.	TX0008472670 TX0008074197 TX0007722020 TX0007341034 TX0006579342	2017-08-24

	Title	Copyright Registration Number	Copyright Registration Date
86	Elaine Marieb, Human Anatomy & Physiology, 11th ed.	TX0008592257 TX0008013919 TX0007509831 TX0007001492 TX0006288681 TX0005801979 TX0004175170 TX0004608033 TX0003853726 TX0003239579 TX0002585534	2018-06-08
87	Michael Johnson, Human Biology: Concepts and Current Issues, 8th ed.	TX0008241107 TX0007679131 TX0007340320 TX0006541888 TX0006114073 TX0005638496 PA0001056693	2016-03-04
88	Jeffrey Arnett, Human Development: A Cultural Approach, 3d ed.	TX0008684771 TX0008077587 TX0007525340	2018-12-04
89	Dee Silverthorn, Human Physiology: An Integrated Approach, 8th ed.	TX0008571560 TX0008153349 TX0007530700 TX0006997682 TX0006328890 TX0005801980 TX0005291428 TX0004664794	2018-03-09
90	Christoph Schneider, Information Systems Today: Managing the Digital World, 8th ed.	TX0008530113 TX0008139379 TX0007679053 TX0007324079 TX0006972110 TX0006584037 TX0006151746 TX0005689012	2017-11-13
91	Donald Baack, Integrated Advertising, Promotion, and Marketing Communications, 8th ed.	TX0008586040 TX0008047588 TX0007710250 TX0007325003 TX0006939525 TX0005757691 TX0005432547	2017-11-13
		TX0008236474 TX0007541023 TX0006991771	

	Title	Copyright Registration Number	Copyright Registration Date
92	Elayn Martin-Gay, Intermediate Algebra, 7th ed.	TX0008078297 TX0007639789 TX0005956711 TX0005563560 TX0005598366 TX0005276841 TX0005053826 TX0004486763 TX0003781249 TX0006845794 TX0004478937	2016-03-04
93	Margaret Lial, Intermediate Algebra, 13th ed.	TX0008771938 TX0008049366 TX0006883964 TX0007098269 TX0005457547 TX0003187624 TX0002210172 TX0001295388 TX0000714869 TX0001105800 TX0000483894 TX0000484043	2019-06-25
94	Robert Blitzer, Intermediate Algebra for College Students, 7th ed.	TX0008242456 TX0006852845 TX0006118668 TX0005441481 TX0004630231 TX0004638328 TX0004012032	2016-03-04
95	Patricia Wallace, Introduction to Information Systems: People, Technology and Processes, 3d ed.	TX0008553028 TX0007882245 TX0007509758	2017-11-15
96	Y. Daniel Liang, Introduction to Java Programming and Data Structures, Comprehensive Version, 11th ed.	TX0008522911 TX0007846488 TX0007545835 TX0007235376 TX0006862620 TX0006443623 TX0006099996 TX0005596033 TX0005880274 TX0005311554	2017-10-30
97	Cecil Bozarth, Introduction to Operations and Supply Chain Management, 5th ed.	TX0008587027 TX0007573503 TX0006843344 TX0006148566	2018-05-04

	Title	Copyright Registration Number	Copyright Registration Date
98	Nivaldo Tro, Introductory Chemistry, 6th ed.	TX0008464936 TX0007932714 TX0007329047 TX0006907837 TX0005656069	2017-08-24
99	Audrey Berman, Kozier & Erb's Fundamentals of Nursing, 10th ed.	TX0008070150 TX0007329001 TX0006574108 TX0005813357 TX0005023100 TX0003927459 TX0003063528 TX0002035445 TX0001273907 TX0000337378	2015-04-09
100	Edward Prather, Lecture - Tutorials for Introductory Astronomy, 3d ed.	TX0007651919 TX0005960787 TX0005624452	2012-12-20
101	David C. Lay, Linear Algebra and Its Applications, 5th ed.	TX0008028767 TX0007365540 TX0006226146 TX0005659182 TX0004250657 TX0004504802 TX0003704659 TX0003642510	2015-02-12
102	Andrew Abel, Macroeconomics, 9th ed.	TX0008327068 TX0007704903 TX0007348400 TX0006503487 TX0006971455 TX0005908214 TX0005208394 TX0005559024 TX0004674076 TX0003887306 TX0003255577	2016-07-25
103	Stephen Robbins, Management, 14th ed.	TX0008517955 TX0008070770 TX0007745406 TX0007324972 TX0006929804 TX0006522915 TX0005912230 TX0005677565 TX0005430504 TX0005138468	2017-10-02

	Title	Copyright Registration Number	Copyright Registration Date
		TX0004358976 TX0003679147 TX0003577832 TX0002762382	
104	Kenneth Laudon, Management Information Systems: Managing the Digital Firm, 16th ed.	TX0008792067 TX0008498612 TX0008088665 TX0007694316 TX0007335808 TX0006954808 TX0006522788 TX0006149849 TX0005725172 TX0005366365 TX0005065901 TX0004664133	2019-08-29
105	Karen Braun, Managerial Accounting, 5th ed.	TX0008470172 TX0007514778 TX0007089279	2017-09-13
106	Kevin Keller, Marketing Management, 15th ed.	TX0008144794 TX0007341042 TX0006937152 TX0006150569 TX0005563569 TX0005064805 TX0004478935 TX0003618735 TX0002982854 TX0002212582 TX0001268132 TX0000416318 A00000712346	2015-08-04
107	Duane DeTemple, Mathematical Reasoning for Elementary Teachers - Media Update, 7th ed.	TX0008592046 TX0007984801 TX0006848220 TX0006214434	2018-06-08
108	Sybilla Beckmann, Mathematics for Elementary Teachers with Activities, 5th ed.	TX0008477536 TX0007666585 TX0006540823 TX0005648357 TX0005648372	2017-09-13
109	Darrel Hess, McKnight's Physical Geography: A Landscape	TX0008330376 TX0007686692 TX0007219138 TX0006959320 TX0006089206 TX0005366377	2016-07-10

	Title	Copyright Registration Number	Copyright Registration Date
109	Appreciation, 12th ed.	TX0005068397 TX0004221814 TXu000543682 TX0003219161 TX0002000557 TX0001291902	2010-07-19
110	Susan Turley, Medical Language: Immerse Yourself, 5th ed.	TX0008766311 TX0007687777 TX0007162135 TX0006354621	2019-06-25
111	Bruce Wingerd, Medical Terminology Complete!, 4th ed.	TX0008574070 TX0008147036 TX0007517251 TX0006877548	2018-03-29
112	Jane Rice, Medical Terminology for Health Care Professionals, 9th ed.	TX0008476706 TX0007857146 TX0007334536 TX0005945097 TX0004930971 TX0003948133 TX0003053926 TX0001806136	2017-08-09
113	Robert Bauman, Microbiology with Diseases by Taxonomy, 6th ed.	TX0008766307 TX0008229732 TX0007689917 TX0007130493 TX0006289070 PA0001266263	2019-06-25
114	Robert Pindyck, Microeconomics, 9th ed.	TX0008497503 TX0007542251 TX0006864689 TX0006156330 TX0004594221 TX0003923511 TX0003138208 TX0002482057	2017-10-02
115	Jeffrey Perloff, Microeconomics, 8th ed.	TX0008517959 TX0007932604 TX0006326449 TX0005895374 TX0004915354	2017-10-02
116	Glenn Hubbard, Money, Banking, and the Financial System, 2d ed.	TX0007704913 TX0007378490	2013-04-15
117	Janice Thompson, Nutrition: An Applied Approach, 5th ed.	TX0008487258 TX0007856537 TX0007340315 TX0006962211	2017-10-10

	Title	Copyright Registration Number	Copyright Registration Date
		TX0006083013	
118	Lee Krajewski, Operations Management: Processes and Supply Chains, 12th ed.	TX0008558636 TX0008113826 TX0007515552 TX0006937727 TX0006355040 TX0005926751 TX0005473252 TX0004836440 TX0004206657 TX0004193391 TX0003466473 TX0002926832 TX0002754208 TX0002038679	2018-03-09
119	Paula Bruice, Organic Chemistry, 8th ed.	TX0008280289 TX0007687069 TX0007216342 TX0006900323 TX0006400788 TX0005276840 TX0004731975 TX0003960353	2016-02-16
120	Leroy Wade, Organic Chemistry, 9th ed.	TX0008384796 TX0007528456 TX0007095069 TX0006140958 TX0005141194 TX0003989550 TX0003000010 TX0003087159 TX0003040302 TX0002022174	2017-03-02
121	Stephen Robbins, Organizational Behavior, 18th ed.	TX0008553130 TX0008258549 TX0007883643 TX0007507604 TX0007151491 TX0007010770 TX0006597569 TX0006103180 TX0005668575 TX0005176904 TX0004582373 TXu000546052 TX0003044411 TX0002510838	2018-03-09

	Title	Copyright Registration Number	Copyright Registration Date
		TX0001730202 TX0001093658 TX0000215756	
122	Jeff Madura, Personal Finance, 6th ed.	TX0008236465 TX0007685604 TX0006309808 TX0005815667 TX0005434152	2016-03-04
123	Randall D. Knight, Physics for Scientists and Engineers: A Strategic Approach with Modern Physics, 4th ed.	TX0008243493 TX0007518754 TX0006984405 TX0005920354	2016-03-04
124	Peter Zao, PhysioEx 9.0: Laboratory Simulations in Physiology with 9.1 Update, 1st ed.	TX0007765938	2013-08-22
125	Elayn Martin-Gay, Prealgebra & Introductory Algebra, 5th ed.	TX0008571525 TX0007915924 TX0006052324	2018-03-09
126	Marvin Bittinger, Prealgebra and Introductory Algebra, 4th ed.	TX0008078296 TX0006506135	2015-04-20
127	Michael Sullivan, Precalculus, 11th ed.	TX0008792108 TX0008106616 TX0006958308 TX0005946366 TX0005411741 TX0004889465 TX0004250271 TX0003509723 TX0002792339 TX0002250446	2019-08-29
128	Robert Blitzer, Precalculus, 6th ed.	TX0008444622 TX0007696912 TX0006032509 TX0005751814 TX0005828744 TX0005345784	2017-07-31
129	John Hornsby, Precalculus, 6th ed.	TX0008528251 TX0007559642	2017-01-18
130	J. S. Ratti, Precalculus: A Right Triangle Approach, 4th ed.	TX0008561783 TX0007899557	2018-02-26
131	Mark Dugopolski, Precalculus: Functions and Graphs, 4th ed.	TX0007504596 TX0006848209 TX0005956262 TX0005392553	2012-03-15
		TX0008539830 TX0007766300 TX0007150581 TX0005811048	

	Title	Copyright Registration Number	Copyright Registration Date
132	Joseph Mistovich, Prehospital Emergency Care, 11th ed.	TX0005724705 TX0005069418 TX0004155249 TX0003647865 TX0000932213	2017-12-08
133	Sharon Oster, Principles of Economics, 13th ed.	TX0008786213 TX0008227994 TX0007760640 TX0007378482 TX0007120815 TX0006443658 TX0005917329 TX0005578325 TX0005383368 TX0004836794 TX0004237668 TX0003770186 TX0003234974 TX0002488298	2019-08-29
134	Cindy Stanfield, Principles of Human Physiology, 6th ed.	TX0008229728 TX0007661320 TX0007284278 TX0006494936 TX0005462937	2016-02-16
135	George Rejda, Principles of Risk Management and Insurance, 13th ed.	TX0008393594 TX0007709259 TX0007148951 TX0006517736 TX0006059440 TX0005591727 TX0005260011 TX0004591153 TX0003987192 TX0003166365	2017-04-03
136	Tony Gaddis, Starting Out with C++ from Control Structures to Objects, 9th ed.	TX0008534036 TX0007920346 TX0007357284 TX0007005291 TX0006554205 TX0006448127 TX0005193832	2017-11-01
137	Tony Gaddis, Starting Out with Python, 4th ed.	TX0008530722 TX0007908784 TX0007362918 TX0007081350	2017-11-13
		TX0008228456 TX0007529574	

	Title	Copyright Registration Number	Copyright Registration Date
138	James McClave, Statistics, 13th ed.	TX0007120399 TX0005546862 TX0005068611 TX0004347001 TX0003758683 TX0002268055 TX0001678761	2015-12-16
139	Terry Sincich, Statistics for Business and Economics, 13th ed.	TX0008512092 TX0007698835 TX0007127613 TX0005949903 TX0005275073 TX0004665612 TX0003759272 TX0003036262 TX0002280946 TX0001673211 TX0001016303 TX0000005131	2017-09-22
140	David Levine, Statistics for Managers Using Microsoft Excel, 8th ed.	TX0008489092 TX0007745398 TX0007177681 TX0006583786 TX0005941475 TX0005335940 TX0004922222 TX0004681738	2017-01-18
141	Arthur Aron, Statistics for Psychology, 6th ed.	TX0007585119 TX0007005742 TX0006289069	2012-08-30
142	Michael Sullivan, Statistics: Informed Decisions Using Data, 5th ed.	TX0008248711 TX0007016228 TX0006845853 TX0005695940	2016-03-04
143	Joseph Martocchio, Strategic Compensation: A Human Resource Management Approach, 9th ed.	TX0008241371 TX0007853283 TX0007518507 TX0007156894 TX0007005372 TX0006337318 TX0005738267 TX0005196398 TX0004658771	2016-03-04
		TX0008539588 TX0007889105 TX0007524849 TX0007044321	

	Title	Copyright Registration Number	Copyright Registration Date
144	Alan Hoffman, Strategic Management and Business Policy: Globalization, Innovation and Sustainability, 15th ed.	TX0006821477 TX0006349367 TX0005807563 TX0005462097 TX0005073916 TX0004702239 TX0004119406 TX0004119173 TX0003299233 TX0003259135 TX0002473659 TX0001811344 TX0001179366	2017-10-02
145	Fred David, Strategic Management: A Competitive Advantage Approach, Concepts and Cases, 17th ed.	TX0008787412 TX0008784789 TX0008329375 TX0008234485 TX0007856872 TX0007579039 TX0007524846 TX0007165326 TX0006935727 TX0005624450 TX0005267836 TX0004913027 TX0004493636 TX0003980181 TX0003431555 TX0002961768 TX0002498182 TX0001776204	2019-08-29
146	Robert Blitzer, Thinking Mathematically, 7th ed.	TX0008564508 TX0007146474 TX0007786203 TX0005912352 TX0005524845 TX0005046001	2018-03-05
147	Joel Hass, Thomas' Calculus: Early Transcendentals, 14th ed.	TX0008485048 TX0007909634 TX0007953254 TX0006399927 TX0005680128 TX0005572275 TX0004143028 TX0003276747 TX0002273389 TX0001303399	2017-09-06

	Title	Copyright Registration Number	Copyright Registration Date
		RE0000735692 A00000998387 RE0000396444 A00000436966 RE0000105211 A00000089964 TX0000203982 A00000350749	
148	Scott Powers, Total Fitness and Wellness, 8th ed.	TX0008772020 TX0008243505 TX0007683462 TX0007127668 TX0006170236 PA0001116792 TX0004932722 TX0004131659	2019-06-25
149	John Hornsby, Trigonometry, 11th ed.	TX0008414257 TX0007559643 TX0005995342 TX0003658600 TX0002488809 TX0001531339 TX0000656476 A00000851136	2017-05-08
150	Charles Morris, Understanding Psychology, 12th ed.	TX0008570066 TX0008088525 TX0007841232 TX0007157400 TX0006552866 TX0006151717 TX0005624102 TX0005275573 TX0004888991 TX0004531195 TX0003467375 TX0003055023	2018-02-26